

KAISER
ALUMINUM

KAISER ALUMINUM & CHEMICAL CORPORATION

April 21, 1986

Cheryl Saylor
Chem-Security Systems, Inc.
Star Route
Arlington, OR 97812

Dear Cheryl:

Some of the gravel in our rectifier yard is contaminated with low levels of PCB's. With the assistance of Landau Associates, Inc., we are in the process of developing an overall plan for area cleanup, however, this plan has not been completed. One transformer, VR-2A, was removed for service in early March and it was decided to replace the gravel under it. The attached scope of work was prepared and the contaminated gravel was to be handled as follows:

- Remove contaminated gravel and put it into dump boxes.
- Dump contaminated gravel into a truck from Secured Resources Transport, Inc. and manifest it to Arlington as code X002/W001 (waste profile sheet # E42986).

While I was gone, a small contractor was hired and he dumped the contaminated gravel onto the spent potlining pile. It was then shipped to Arlington mixed with several loads of spent potlining (B85343) on or about March 31, 1986. I became aware of the problem after the material had been delivered to Chem-Security Systems, Inc.

The oil in transformer VR-2A was tested and found to contain 16 ppm of PCB on 2/11/80 and 12 ppm of PCB on 1/24/86. A surface sample of gravel was tested in March 1985 and found to contain 19 ppm of PCB. In order to clean the area to less than 1 ppm of PCB, it was decided to remove the contaminated gravel from an area 15' by 20' by 1' deep which represents about 11 cubic yards (about 19 tons). Analysis of the soil in three locations after the contaminated material had been removed showed the following PCB results: 0.04 ppm, 0.26 ppm and 1.1 ppm. A copy of this analysis is attached. I would estimate that the contaminated material received by Arlington in the spent potlining had an average PCB content of about 10 ppm. On 4/17/86, a small load of PCB contaminated gravel removed from under the transformer where the level was 1.1 ppm was correctly shipped (manifest # 00174).

Should you have any questions, please contact me at 206-591-0416.

Sincerely,

Paul F. Schmeil
Paul F. Schmeil
Staff Environmental Engineer

EPA
KA 000099

Attachments

cc: John Baker Jack Schwegmann 1241 KB C. Brown 828 KB

TACOMA PLANT

3400 TAYLOR WAY, TACOMA, WASHINGTON 98421 PHONE (206) 383-1461